

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

April 8, 2021

The Hon. Margo K. Brodie
Chief United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Andre Wilburn*, No. 19 Cr. 108 (MKB)

Your Honor:

This office represents Andre Wilburn. I respectfully request that the pretrial motion calendar be adjourned by one month. The government does not object. Mr. Wilburn requires more time to review my draft motion, and I want Mr. Wilburn's recent letter to the Court to be addressed at a hearing before I file further papers on Mr. Wilburn's behalf.

Should the Court grant this request, the amended pretrial motion calendar would be:

Defense motion to suppress due May 10, 2021;

Government response due June 10, 2021;

Defense reply due June 24, 2021.

I ask that, as with the previous calendars, this new calendar be set without prejudice to a further adjournment should disruptions continue. The defense does not oppose granting the government additional time to respond, if needed.

Respectfully submitted,

/s James Darrow

James Darrow
Assistant Federal Defender
James_Darrow@fd.org
(718) 407-7419

Attorneys for Andre Wilburn